



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 03/31/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Wastewater
Site/Facility Name: Inland Bays Regional Wastewater Treatment Facility
Permittee(s): Sussex County Council
Site/Facility Operator: Sussex County Council
Site/Facility Address: 29445 Inland Bays Road
Millsboro, DE 19966
Latitude: 38.6366410 **Longitude:** -75.232600
County/Parish: Sussex
General Permit #: Not Applicable
Site Specific Permit #: DEI000426
NAICS Code: 237110 **SIC:** 4952
Unique Project #: 3E22WN087A

Site/Facility Representative(s): **Point of Contact**
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I. Introduction

On March 31, 2022, an inspection team composed of staff from the U.S. Environmental Protection Agency (EPA) Region III (hereinafter, "EPA Inspection Team") met with representatives of the Delaware Department of Natural Resources and Environmental Control (DNREC) at the Inland Bays Regional Wastewater Treatment Facility (RWTF). The EPA Inspection Team was accompanying DNREC on their inspection of the facility.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the site at approximately 1:00 PM for the announced inspection. The EPA Inspection Team identified themselves to the Facility Representatives, displayed their credentials and described that they were accompanying DNREC on their inspection of the Facility. The EPA Inspection Team walked a portion of the site with DNREC Officials and Facility Representatives. The EPA Inspection Team's observations are listed later in this document and are grouped by type of observation made.

B. Weather and Precipitation Conditions

During the inspection, weather was overcast. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 1. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
Georgetown Delaware Coastal Airport, DE US USW00013764	03/26/2022	0.02
Georgetown Delaware Coastal Airport, DE US USW00013764	03/27/2022	0.00
Georgetown Delaware Coastal Airport, DE US USW00013764	03/28/2022	Trace
Georgetown Delaware Coastal Airport, DE US USW00013764	03/29/2022	0.00
Georgetown Delaware Coastal Airport, DE US USW00013764	03/30/2022	0.00
Georgetown Delaware Coastal Airport, DE US USW00013764	03/31/2022	0.07

C. Summary of the Site/Facility

The Inland Bays RWTF is a wastewater treatment facility in Sussex County Delaware which spray irrigates several hundred acres of land with treated wastewater.

II. Site/Facility Activity

The Inland Bays RWTF collects and treats wastewater from Long Neck Sanitary Sewer District (LNSSD), Oak Orchard Sanitary Sewer District (OOSD) and the Angola Sanitary Sewer

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

District (ANSSD) to spray and irrigate the treated wastewater on multiple facility spray fields. The property is located on County Road 306 and is bounded by County Roads 303, 307 and 297.

According to the permit "The Inland Bays RWTF is a secondary treatment facility designed to treat a summer maximum monthly average daily flow of 2.0 million gallons per day (MGD) and consists of an activated sludge system with two phased-aeration basins for biological nutrient removal (BNR), two clarifiers, one chlorine contact chamber for disinfection, a 39-million-gallon effluent storage lagoon, a 32-million-gallon storage lagoon and solids handling, storage and dewatering facilities. The system's design disposal capacity is 2.65 MGD. The treated wastewater is spray irrigated onto 432.5 acres via center pivot spray irrigation systems. The wetted fields are planted with corn and soybean during the summer growing season. There are approximately eight spray fields at the facility. At the time of the inspection construction was occurring around some of the spray fields. The inspection team walked the areas without construction activities which were the North Field, North Burton Field and South Burton Field.

III. Observations

The following section summarizes the EPA Inspection Team's observations after walking and observing the Facility conditions, talking with Facility Representatives, and reviewing Section 9 of the state's 7201 Regulations Governing the Control of Water Pollution. The EPA Inspection Team did not review the Storm Water Plan which was approved by DNREC on March 13, 2022.

Potential Discharge of Spray Irrigation

The EPA Inspection Team accompanied DNREC Representatives on their inspection to determine if material spray irrigated to the fields by the Inland Bays RWTF was migrating off-site via overland flows.

Observation #1:

At the time of the inspection, the fields were not being sprayed, though Facility Representatives made it seem that spraying occurred on a daily or near daily basis. The EPA Inspection Team observed several areas with large pools of water in the spray field and walked across many saturated areas. However, there was no evidence of offsite migration observed during the inspection. DNREC Representatives informed the EPA Inspection Team that DNREC's Groundwater Discharges Section will be notified regarding the observed ponding to determine if any follow-up is warranted under Spray Permit.

IV. Records Review

Section 9 of Delaware's 7201 Regulations Governing the Control of Water Pollution.

V. Closing Conference

At the conclusion of the onsite inspection, a closing conference was held with Facility Representatives. The EPA Inspection Team shared their preliminary observations during the closing conference and reiterated that all preliminary observations discussed were not compliance determinations. Preliminary observations are subject to further investigation by

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EPA, including additional review of records and documentation. As a result, additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 2:30 PM (EDT).

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